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Subchapter V Trustee

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

IN RE:)	
)	
SKIN LOGIC, LLC)	
)	Case No. 23-11352-KHK
)	Chapter 11
Debtor)	

**CONSENT OF DEBTOR’S SECURED CREDITORS TO
SUBCHAPTER V TRUSTEE’S MOTION FOR ENTRY OF
AN ORDER APPROVING SALE OF SUBSTANTIALLY ALL OF DEBTOR’S ASSETS**

1. On November 15, 2024, Stephen Metz, Subchapter V trustee (the “Trustee”) filed a Motion for Entry of an Order Approving Sale of Substantially All of Debtor’s Assets [Doc. 160] (the “Sale Motion”). In the Sale Motion, the Trustee seeks approval to sell Debtor’s assets to Dr. Leila Kump or designated assignee Aria Elite LLC for \$1,150,000.00 (the “Purchase Price”).

2. In Paragraph 13 of the Sale Motion, the Trustee stated that he believed 11 U.S.C. § 363(f) would be satisfied because the Trustee believed the Debtor’s secured creditors would consent to the proposed sale.

3. The Debtor has the following secured creditors: (i) the U.S. Small Business Administration; (ii) EagleBank; and (iii) Cadence Bank.

4. On December 3, 2024, the U.S. Small Business Administration filed an Amended Proof of Claim (POC 7) stating a secured claim of \$548,751.95. On November 20, 2024, EagleBank filed an Amended Proof of Claim (POC 2) stating a secured claim of \$391,169.11. On

March 26, 2024, Cadence Bank filed an Amended Proof of Claim (POC 4) stating a secured claim of \$396,448.69.

5. The Trustee requested that each of the secured creditors agree to accept less than the amounts owed to them and to consent to the proposed sale, to enable the Debtor's estate to pay administrative professional fees and so that unsecured creditors will receive a distribution.

6. The U.S. Small Business Administration consents to the proposed sale free and clear of its liens, claims and encumbrances, with its liens, claims and encumbrances to attach to the proceeds of sale (and to be paid at closing), subject to a reduction of \$35,000.00 of its secured claim.

7. EagleBank consents to the proposed sale free and clear of its liens, claims and encumbrances, with its liens, claims and encumbrances to attach to the proceeds of sale (and to be paid at closing), subject to a reduction of \$35,000.00 of its secured claim.

8. Cadence Bank consents to the proposed sale free and clear of its liens, claims and encumbrances, with its liens, claims and encumbrances to the proceeds of sale (and to be paid at closing); provided, however, that Cadence Bank shall be paid a total of \$40,000.00 on account of its secured claim, with the balance of its claim to be treated as an unsecured claim in this case.

Respectfully submitted,

OFFIT KURMAN, P.A.

By: /s/ Stephen A. Metz
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Subchapter V Trustee

WE CONSENT:

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of January, 2025, a copy of this Consent was served via CM/ECF on all registered ECF participants who have appeared in this case.

/s/ Stephen A. Metz
Stephen A. Metz